ESTTA Tracking number:

ESTTA635080 10/24/2014

Filing date:

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91214938
Party	Defendant KSB Aktiengesellschaft
Correspondence Address	WILLIAM J SAUERS CROWELL & MORING LLP PO BOX 14300 WASHINGTON, DC 20044 4300 UNITED STATES edocket@crowell.com, wsauers@crowell.com
Submission	Answer
Filer's Name	Preetha Chakrabarti
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Signature	/Preetha Chakrabarti/
Date	10/24/2014
Attachments	KSB Answer - REEL SUPREME Opp.pdf(10158 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

BALDOR ELECTRIC COMPANY,)		
)		
Opposer,)		
)	Opp. No.:	91214938
v.)	App. No.:	79/112,458
)	Pot. Mark:	REEL SUPREME
KSB AKTIENGESELLSCHAFT,)		
)		
Applicant.)		
)		

APPLICANT'S ANSWER TO OPPOSER'S FIRST AMENDED NOTICE OF OPPOSITION

KSB Aktiengesellschaft ("Applicant") by and through its undersigned counsel, responds to the Notice of Opposition as follows:

- 1. Applicant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 1 and therefore denies those allegations.
 - 2. Applicant admits the allegations in Paragraph 2.
 - 3. Applicant admits the allegations in Paragraph 3.
- 4. Applicant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 4 and therefore denies those allegations.
- 5. Applicant admits that Baldor Electric Company ("Opposer") is listed as "owner" in the records of the U.S.P.T.O. online database for U.S. Registration No. 2,820,046. Applicant lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 5 and therefore denies those allegations.
 - 6. Paragraph 6 contains an allegation for which no answer is required.
 - 7. Applicant denies the allegations in Paragraph 7.

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8. Paragraph 8 contains an allegation for which no answer is required.

9. Applicant denies the allegations in Paragraph 9.

10. Applicant denies the allegations in Paragraph 10.

11. Applicant denies the allegations in Paragraph 11.

Wherefore, we respectfully request that Baldor's Opposition No. 91214938 be denied and that the registration be issued for the mark REEL SUPREME, as shown in Application No. 79/112,458.

Respectfully submitted,

/Dickerson M. Downing/

Dickerson M. Downing William J. Sauers Preetha Chakrabarti

Attorneys for Applicant

CROWELL & MORING LLP

590 Madison Ave New York, NY 10022

Telephone No.: (212) 895-4212 Facsimile No.: (212) 223-4134

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing APPLICANT'S

ANSWER TO OPPOSER'S NOTICE OF OPPOSITION was served on counsel for Opposer this

24th day of October, 2014, by sending same via First Class Mail, postage prepaid, to:

Hadi S. Al-Shathir, Esq. Thompson Coburn LLP One US Bank Plaza St. Louis, MO 63101

/Preetha Chakrabarti/	
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